

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA**

**v.**

**DAMILARE SONOIKI**

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**Criminal No. 18-368**

**DEFENDANT’S MOTION FOR MODIFICATION OF CONDITIONS  
OF RELEASE TO PERMIT TRAVEL TO SEEK EMPLOYMENT**

Damilare Sonoiki, by his attorney, Mark Wilson, Assistant Federal Defender, moves that the Court modify his conditions of release to permit travel to seek employment and in support of this Motion it is averred that:

1. On September 19, 2018, Damilare Sonoiki made his initial appearance before this Court and entered a plea of guilty to the charges in the Information that had been filed on August 29, 2018. At that hearing he was granted presentence release on certain conditions among which was a travel restriction to the Central District of California, where he was then residing, and the Southern District of Texas, where his mother resides.

2. The conditions of Mr. Sonoiki’s release were modified by Order of the Court on December 10, 2018, to permit him to reside with his mother in the Southern District of Texas. Mr. Sonoiki’s lease in California had expired. In the Order modifying his release conditions his travel was “restricted to the Southern District of Texas, or other locations with prior approval by Pretrial Services.”

3. Mr. Sonoiki has been unable to obtain employment in the Southern District of Texas. He seeks permission of the Court to be able to travel for the purpose of seeking

employment. Mr. Sonoiki has been previously employed as a script writer for television shows. His best chance of obtaining employment is in this field. The places where employment can be obtained in this field are almost exclusively in Los Angeles and New York.

4. Mr. Sonoiki has had some telephone contacts with individuals who might be willing to provide him with employment, but he would be required to travel for face-to-face meetings. He therefore desires to be permitted to travel to explore employment opportunities with prior notice to Pretrial Services regarding dates of travel.

WHEREFORE Damilare Soniki respectfully requests that the Court modify his conditions of release to permit travel to look for work with prior notice to Pretrial Services.

Respectfully submitted,

/s/ Mark Wilson

Mark Wilson  
Assistant Federal Defender

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**ORDER**

AND NOW this                      day of May, 2019, upon consideration of the Defendant's Motion for Modification of Conditions of Release to Permit Travel to Seek Employment, it is hereby **ORDERED** that the Motion is **GRANTED**. The conditions of Mr. Sonoiki's release are modified to permit him to travel outside of the Southern District of Texas with prior notice to Pretrial Services for the purpose of seeking employment.

SO ORDERED:

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GENE E. K. PRATTER, J.  
United States District Court